MITRE

23 February 1987
W52-1733

Ms. Jeanne Griffin
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Ms. Griffin:

Enclosed please find the quality assurance comments concerning People's Avenue Landfill, Rockford, Illinois.

If you have any questions regarding this material, please contact Martha Bodden at (703) 883-7667 or me at (703) 883-7676.

Sincerely,

Sue Russell

Sue Russell
Group Leader
Hazardous Waste and Safety Systems

SR/ks

Enclosure

cc: S. Parrish
A. Sarno

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PEOPLE'S AVENUE LANDFILL
ROCKFORD, ILLINOIS
Martha Bodden
23 February 1987

Ground Water Route

For the reasons given below, sampling data for monitoring wells on or near the site are not adequate to attribute contaminants to the facility.

First, although cyanide was detected in April 1985 in a well downgradient from the site and not in an upgradient well, cyanide was also detected in upgradient wells in August 1984. This suggests that cyanide may be originating from sources other than (or in addition to) People's Avenue Landfill.

Second, the amount of benzene detected (6.2 ppb) is barely above acceptable detection limits (as required under the contract lab program--no lab limits were given with the site data). Given the extent of volatile organic ground water contamination throughout this area, including that around the IPC site (which is upgradient to People's Avenue Landfill), a finding of 1 ppb over detection limits for benzene does not adequately document an observed release from this site.

Finally, it becomes even less defensible to attribute an extremely low level of a volatile organic compound to a site for which there is no documentation on wastes deposited.

The proximity of the IPC facility to this site, and the apparent similarities in contaminants downgradient from both sites, make attribution of contaminants to the site difficult. Since there is not yet any record for hazardous wastes, current sampling results do not show that either benzene or cyanide have been released specifically from wastes at this facility.

The following are suggested:

1. Continue efforts to obtain information on wastes that were deposited; perhaps contacting industries in the area will turn up information that was not reported to the IEPA or IDPH.

2. Review all extant data for ground water sampling including that collected for other sites by Illinois State (see site packages for South East Rockford and IPC).

3. If the data are still insufficient to score an observed release, consider route characteristics, particularly if you can obtain some information on wastes deposited at the site. Information would be needed to score a value for physical state. Distance to nearest well could possibly be measured from the soil samples reported in Reference 3, although more information is needed on location and depth of these samples.

If the target population for this site is significantly overlapping with that for the Southeast Rockford and IPC sites, and given the possibility that the sources and/or types of waste are similar, it may be worthwhile to review the criteria for non-contiguous sites (48 FR 40663, September 8, 1963).